

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:

Harris G. Griffin

Case No.: 19-12815-elf

Debtor(s)

Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Harris G. Griffin, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on May 1, 2019.
2. The Chapter 13 filing was assigned case number 19-12815.
3. The Chapter 13 Plan was confirmed by this Honorable Court on October 29, 2019.
4. On or about May 25, 2021, Debtor entered into a permanent modification with PennyMac Loan Services, LLC.
5. The Debtor respectfully requests that this Court permit the Debtor to modify his plan to remove the pre-petition arrears pursuant to the loan modification agreement.
6. In furtherance of this Motion, a Modified Chapter 13 Plan is being contemporaneously filed.
7. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", is affordable to the Debtor.

**WHEREFORE**, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: July 20, 2021

/s/Brad J. Sadek, Esq.  
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